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December 9, 2021

By ECF

Honorable Ona Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.*,
20-cv-8668-VM-OTW

Dear Judge Wang:

The parties write jointly with a status update in advance of our December 14, 2021 status conference. On December 4, 2021, Judge Marrero entered a new Case Management Plan setting the close of fact discovery on March 14, 2022, and expert discovery on May 16, 2022. *See D.E. 152 at 2–4.* Plaintiffs have been working diligently to meet those deadlines. Plaintiffs, the Office of the Attorney General (OAG) and the National Coalition on Black Civic Participation, et al., (National Coalition) have each served their initial disclosures and first sets of document requests and interrogatories. We currently await responses to our discovery requests and the supplementation ordered by the Court on November 29, 2021, now due tomorrow, December 10, 2021. *See D.E. 151 at 8.* The National Coalition has responded to Defendants Wohl and Burkman's first set of discovery requests. The OAG has not yet been served with any discovery requests; December 15, 2021 is the deadline for initial requests. *See D.E. 152 at 2.* No motions are currently pending. The claims against Message Communications have been referred to the Court-annexed Mediation Program. D.E. 159. The next case management conference before Judge Marrero is scheduled for April 1, 2022. D.E. 157.

Respectfully,

/s/ Rick Sawyer
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cc: Counsel of record (via ECF and e-mail)